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January 28, 2019

VIA E-FILING

Jocelyn Boyd, Esquire Chief Clerk and Administrator South Carolina Public Service Commission 101 Executive Center Drive Columbia, SC 29210

RE:

Application Duke Progress Carolinas, LLC for Adjustments in Electric Rate

Schedules and Tariffs Docket No. 2018-318-E

Dear Ms. Boyd:

I have enclosed for filing the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record and requesting that each serve me with all outstanding motions or other pleadings, together with all discovery responses served to date and to be served.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk Enclosures

cc:

All parties of record (w/enc.)

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-318-E

| IN THE MATTER OF: |) | |
|--|---|-----------------------|
| |) | |
| Application Duke Energy Progress, LLC |) | PETITION TO INTERVENE |
| for Adjustments in Electric Rate Schedules |) | |
| and Tariffs |) | |

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-836 of the Commission's rules and regulations to intervene and to be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

- 1. That on November 8, 2018, Duke Energy Progress, LLC ("Duke Progress" or the "Company") filed an application with the Commission pursuant to S.C. Cod Ann. §§ 58-27-820 and 58-27-870 and S.C. Code Ann. Regs 103-303 and 103-823 seeking, *inter alia*, authority to adjust, change and increase its retail electric rates, charges and tariffs which, according to the application, would increase annual revenues by approximately 10.3% or \$59 million.
- 2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.

- 3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from Duke Progress.
- 4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.
- 5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.
- 6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
- 7. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;

- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.

Scott Elliott, Esquire ELLIOTT & ELLIOTT, P.A. 1508 Lady Street Columbia, S.C. 29201 (803) 771-0555 selliott@elliottlaw.us

Attorney for the South Carolina Energy Users Committee

Columbia, South Carolina January 25, 2019

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

Application Duke Energy Progress, LLC for Adjustments

in Electric Rate Schedules and Tariffs

DOCKET NO .:

2018-318-E

PARTIES SERVED:

VIA ELECTONIC AND REGULAR MAIL

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PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA ENERGY USERS COMMITTEE

January 28, 2019

Linda B. Kitchens, Paralegal ELLIOTT & ELLIOTT, P.A.

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